

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2021 DEC 16 AM 11:51

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DOMINIC D. CAMPBELL,

Defendant.

CASE NO.

JUDGE

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)

18 U.S.C. § 924(d)(1)

FORFEITURE ALLEGATION

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(Prohibited Person in Possession of a Firearm)

On or about September 18, 2021, in the Southern District of Ohio, the defendant, **DOMINIC D. CAMPBELL**, knowing that he had been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: one Taurus, GC3, 9mm pistol, bearing serial number ACC625172; and one Glock, 43X, 9mm pistol, bearing serial number BNPH849, said firearms having been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

COUNT 2

(Prohibited Person in Possession of a Firearm)

On or about November 12, 2021, in the Southern District of Ohio, the defendant, **DOMINIC D. CAMPBELL**, knowing that he had been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: one Glock 27, 40 caliber pistol, bearing serial number SFZ955, said firearm having been

shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

FORFEITURE ALLEGATION

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of one or more of the offenses alleged in this Indictment, the defendant, **DOMINIC D. CAMPBELL**, shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to:

- a. A Taurus, GC3, 9mm pistol, bearing serial number ACC625172;
- b. Approximately 6 rounds of 9mm ammunition;
- c. A Glock, 43X, 9mm pistol, bearing serial number BNPH849;
- d. A Glock 27, 40 caliber pistol, bearing serial number SFZ955; and
- e. Approximately 9 rounds of 40 caliber ammunition.

Forfeiture notice in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A True Bill.

s/Foreperson

GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**


ELIZABETH A. GERAGHTY (0072275)
Assistant United States Attorney